


# **EXHIBIT G**

May 22, 2019 Email from Anne-Marie Birk to  
Ronald Green

From: **Anne-Marie Birk** abirk@switch.com   
 Subject: Document Collection

Date: May 22, 2019 at 4:22 PM

To: mjr@randazza.com, Ron Green rdg@randazza.com

Cc: F. Christopher Austin caustin@weidemiller.com, Brianna Show bshow@weidemiller.com, Sam Castor sam@switch.com, Emily Shaevitz eshaevitz@switch.com, Tanya Paonessa tpaonessa@switch.com

AB

Ron,

Please be advised that Switch is no longer willing to explore paying for the e-discovery costs of OpenText for your client Mr. Fairfax. As you know, during our meeting in August, Switch was open to covering the expenses of imaging your client's hard drives to accelerate Switch's access to the data, in the spirit of karmic resolution, and to avoid unnecessary litigation costs. The opposite has occurred. Despite our willingness to engage in this unconventional practice to the benefit of your client, to date Switch has not received any documents. It has now been over 9 months.

Making matters worse, we have been informed that Mr. Fairfax is obstructing access, and has no intention of allowing Switch to view *any* documents. This is not in keeping with what we proposed, and has been an exercise in abuse of our trust and professionalism. Again.

Accordingly, at this time Switch will proceed with discovery in the ordinary course, with each side bearing their own costs. As you know, your client was served with written discovery in March of 2018 (see attached). Please have your answers to our discovery requests by the end of the month, **May 31, 2019**.



**ANNE-MARIE BIRK**  
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